

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

CRAFTON MOORE,)	
)	Case No.: 18-CV-00539
)	
Plaintiff,)	
)	
v.)	
)	
STATE FARM FIRE AND)	
CASUALTY COMPANY)	
Defendant.)	

**DEFENDANT STATE FARM FIRE AND CASUALTY COMPANY’S
RULE 26(a)(3) PRETRIAL DISCLOSURES**

Pursuant to Fed. R. Civ. P. 26(a)(3), the Defendant State Farm Fire and Casualty Company (“State Farm”), through its attorneys Meissner Tierney Fisher & Nichols, S.C., Hereby makes the following pretrial disclosures:

I. WITNESSES

A. Witnesses that State Farm intends to call:

1. Fact Witnesses
 - i. Lilian Grandy
311 Iowa Street
Waterloo, Iowa 50703
 - ii. John Perrault
Claim Specialist,
State Farm Insurance Company
3848 North Sawyer Road
Oconomowoc, Wisconsin 53066
 - iii. Crafton Moore (adversely)
3949 N. 24th Street
Milwaukee, WI 53206

- iv. Lt. Michael Schwade
Milwaukee Fire Department
711 West Wells Street
Milwaukee, WI 53233

2. Expert Witnesses

- i. Mike Quick, IAAI-CFI (by video)
MP Quick Consulting
801 Vine Place
West Bend, WI 53095

B. Witnesses that State Farm may call:

1. Fact Witnesses

- i. Dirk L. Hedglin, or other representative of Great Lakes Analytical
Great Lakes Analytical, Inc.
17526 Ten Mile Road
Eastpoint, Michigan 48021
- ii. Lieutenant William R. Code
Milwaukee Fire Department
2903 N. Teutonia Ave.
Milwaukee, Wisconsin 53206
- iii. Detective Brian Stott
Milwaukee Police Department
2333 N. 49th Street
Milwaukee, Wisconsin 53210

2. Expert Witnesses

- i. Derek Starr, P.E., IAAI-CFI
SEA, Ltd.
1800 Howard Street, Ste. A
Elk Grove Village, IL 60007

II. DEPOSITION DESIGNATIONS

- 1. Examination Under Oath of Crafton Moore dated August 25, 2017.
- 2. Deposition Transcript and Video of Lillian Grandy dated September 16, 2019.
- 3. Deposition transcript of Sean Slowery, dated August 30, 2019.
- 4. Deposition Transcript of Lt. Michael Schwade, dated August 30, 2018.
- 5. Deposition Transcript of Michael Quick, dated February 26, 2019.

III. EXHIBITS

1. Crafton Moore Recorded Statement (Moore 8/25/17 EUO Exhibit 6)
2. Crafton Moore Individual Income Tax Return 2013
3. Crafton Moore Individual Income Tax Return 2014
4. Crafton Moore Individual Income Tax Return 2015
5. Crafton Moore Individual Income Tax Return 2016
6. Crafton Moore Individual Income Tax Return 2017
7. Great Lakes Analytical, Inc. Laboratory Report dated March 28, 2017 (Quick 2/26/19 Dep. Exhibit 10)
8. Origin and Cause Summary Report dated April 17, 2017 authored by Michael Quick (Quick 2/26/19 Dep. Exhibit 11)(not intended for admission)
9. Michael Quick Curriculum Vitae Summary (Quick 2/26/19 Dep. Exhibit 4)
10. Michael Quick file (Quick 2/26/19 Dep. Exhibit 8)(not intended for admission)
11. Michael Quick Return Receipt for Merchandise (Quick 2/26/19 Dep. Exhibit 13)
12. Milwaukee Police Department Incident (Quick 2/26/19 Dep. Exhibit 14)
13. MP Quick Consulting LLC Invoice (Quick 2/26/19 Dep. Exhibit 12)(not intended for admission)
14. Residential Fire – Electrical Evaluation Report dated December 7, 2018 authored by Derek A. Starr, P.E., IAAI-CFI (Quick 2/26/19 Dep. Exhibit 6)(not intended for admission)
15. March 20, 2017 Moore Site Exam (Quick 2/26/19 Dep. Exhibit 5)
16. Milwaukee Fire Department Incident Report/FIU Data Summary/Company Report dated March 4, 2017 (Schwade 8/30/18 Exhibit 1)(not intended for admission)

17. Milwaukee Police Department Incident Report, with supplemental report (not intended for admission)
18. Jennifer Williams Recorded Statement (Quick 2/26/19 Dep. Exhibit 17)(not intended for admission)
19. State Farm Property Damage Estimate
20. Photographs
 - a. Michael Quick Photographs
 - i. March 8, 2017 Photographs (76 photographs)
 - ii. March 20, 2017 Photographs (85 photographs)
 - iii. September 6, 2018 Photographs (65 photographs)
 - iv. Annotated Photographs included in report (4 photographs)
 - b. State Farm Photographs
 - i. 171 Photographs
21. Seaway Bank and Trust Company Statements
22. 2016 City of Milwaukee Combined Property Tax Bill (Moore 8/25/17 EUO Exhibit 1)
23. Mike Quick handwritten interview notes of Crafton Moore dated March 8, 2017 (Quick 2/26/19 Dep. Exhibit 9)
24. Demonstrative Exhibits

Dated this 14th day of January 2020.

MEISSNER TIERNEY FISHER & NICHOLS S.C.

s/Mark D. Malloy

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